

U.S. DISTRICT COURT

DISTRICT OF DELAWARE

ORIGINAL

NAVE, LARRY D.

PETITEZNER,

V.

CIVIL ACTION NO: 06-198-J.J.F.

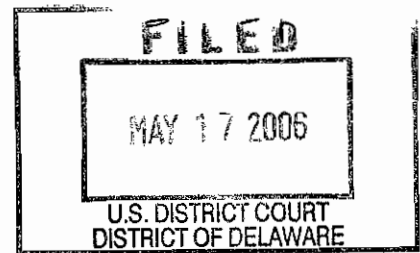
WARDEN, TOM CARROLL,

TREATMENT SUPERINTENDANT

RON HOSIERMAN;

DEPT. OF CORR. ET AL.

DEFENDANTS,



RD Scanned

MOTION FOR DISCOVERY

COMES NOW, LARRY D. NAVE, PRO-SE, PETITEZNER AND
RESPECTFULLY REQUEST THAT COURT ENTER A ORDER PURSUANT TO U.S.
DISTRICT RULES OF CIVIL PROCEDURE, RULE 26 (B), (C) AND (D),
TO HAVE DEFENDANTS DELIVER TO PETITEZNER THE LISTED
DOCUMENTS, ... THESE DOCUMENTS ARE DIRECTLY RELEVANT TO
THIS CIVIL LITIGATION AS THEY WILL SHOW THIS HONORABLE
COURT THAT BY DELAWARE LAW AND DEPARTMENT OF CORRECTIONS
STATUTE, PETITEZNER DOES HAVE A RIGHT TO EMPLOYMENT,
TREATMENT PROGRAMS, AS WELL AS TO DUE PROCESS BEFORE
ANY PUNISHMENT IS FORCED UPON HIM, ... AND THAT THE
DELAWARE CORRECTIONAL CENTER CHANGED THEIR STATUTE
SINCE EARLIER RULINGS BY THIS COURT AND OTHERS
REGARDING INMATES HAVING A RIGHT TO EMPLOYMENT

PG.2

TREATMENT PROGRAMS AND DUE PROCESS REGARDING
PUNISHMENT BEFORE IT'S FORCED UPON PETETCNER..

1), COPIES OF THE CLASSIFICATION DECISION
BEING USED AT THE DELAWARE CORRECTIONAL CENTER...

2), COPIES OF THE NAME AND NUMBER OF INMATES
BEING SUBJECTED TO THE SAME INJUSTICE REGARDING
PETETCNER'S CLASSIFICATION..

3), COPIES OF EVERY CLASSIFICATION DECISION
REGARDING PETETCNER'S CUSTODY AND TREATMENT PLAN AND
OR APPEALS..

4), A DETAILED COPY OF THE EVIDENCE RELIED
UPON BY THE WARDEN THAT RESULTS IN THE WARDEN'S
DECISION TO CONTINUE PETETCNER'S CONFINEMENT IN A
PUNITIVE HOUSING UNIT SINCE 2002, TO DATE..

5), COPIES OF PETETCNER'S CUSTODY AND HOUSING
LEVEL (BEFORE) HIS TRANSFER TO WASH. STATE, D.O.C. IN 1982..

6), COPIES OF PETETCNER'S PRE-APPROVED
CUSTODY AND HOUSING LEVEL WHILE IN WASH. STATE BEFORE
HIS RETURN TO DELAWARE D.O.C..

7), COPIES OF ANY PSYCHOLOGICAL EVALUATION
CONDUCTED ON PETETCNER BETWEEN 2002, AND TO DATE..

8), COPIES OF THE DIRECTIVE REGARDING INMATE
EMPLOYMENT AND INMATE ASSIGNMENT TO EMPLOYMENT..

9), COPIES OF THE INMATE EMPLOYMENT
APPROVAL SHEET FROM 2004 TO DATE..

pg. 3.

10), COPIES OF THE PRE PAROLE COMMITTEES
DECISION AND RECOMMENDATION REGARDING PETEENNER...

11), COPIES OF THE DISCIPLINARY DIRECTIVE
BEING USED AT THE DELAWARE CORRECTIONAL CENTER FROM
2002, TO DATE...

12), COPIES OF PETEENNER'S COMPLETE
DISCIPLINARY RECORDS...

13), COPIES OF THE MULTI DISCIPLINARY
TEAMS DUTIES...

14), COPIES OF THE CHAIN OF COMMAND
MANUAL FOR THE DEL. CORR. CENTER, BY RANK AND DUTIES...

15), COPIES OF THE CUSTODY LEVEL APPROVED
FOR THE DEL. CORR. CENTER FACILITY, BY THE DEPT.
OF CORR...

16), COPIES OF THE DIRECTIVE STATING
WHOM IS AUTHORIZED TO MAKE AND IMPLEMENT
RULES AND REGULATIONS FOR THE DEL. CORR. CENTER...

DATED THIS 15TH DAY OF MAY 2006..

SINCERELY

 #164131
PETEENNER.

CERTIFICATE OF MAILING AND OF DELIVERY

THE UNDERSIGNED CERTIFIES THAT ON MAY 15TH, 2002, HE CAUSED THE ATTACHED MOTION FOR DISCOVERY, TO BE SENT TO THE FOLLOWING PERSONS IN THE FORM AND MANNER INDICATED:

U.S. DISTRICT COURT
844 N. KING ST.
WELM., DE. 19801

ATTORNEY GENERAL
820 N. FRENCH ST.
WELM., DE. 19801

(5) FIVE COPIES TO THE DISTRICT COURT AND ONE COPY TO THE ATTORNEY GENERAL'S OFFICE, BY PLACING FIVE COPIES BY FIRST CLASS MAIL, POSTAGE PRE PAID, TO EACH RECIPIENT..

Larry D. Nave
LARRY D. NAVE #164131
MILIT. 22 DUST
DE. CORA CENTER
1181 Paddock Road
SMYRNA, DE. 19877



WM NAVE, LARRY
SBH# 164131 UNIT 220US7
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977

U.S. DISTRICT COURT
844 N. KENNE ST.
WILM. DE.
19801

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LEGAL MAIL
LEGAL MAIL